

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MOLON MOTOR AND COIL  
CORPORATION,

Plaintiff,

v.

NIDEC MOTOR CORPORATION,

Defendant.

Civil Action No. 1:16-CV-03545

Honorable Edmond E. Chang

**DEFENDANT NIDEC MOTOR CORPORATION'S  
UNCONTESTED MOTION FOR LEAVE TO FILE UNDER SEAL**

Under Local Rule 26.2 and the parties' Proposed Protective Order (Dkt. Nos. 25 and 25-1), Defendant Nidec Motor Corporation ("NMC") respectfully moves this Court for leave to file the following documents under seal: Exhibits 6-8 to NMC's Motion for Partial Summary Judgment.

Exhibits 6-8 are confidential design drawings for NMC's S3210, S5150, and S4405 motors. Exhibits 6-8 contain highly sensitive, confidential information which have been designated as "Highly Confidential – Attorneys' Eyes Only" under the parties' Proposed Protective Order. NMC will file simultaneously with this Motion for Leave a public-record version of its Motion for Partial Summary Judgment with only Exhibits 6-8 excluded, as required by Local Rule 26.2(c).

Due to the sensitive and confidential nature of Exhibits 6-8, NMC respectfully requests that this Court grant its Motion For Leave to File Under Seal.

Counsel for Molon Motor Corporation ("Molon") has confirmed that Molon will not oppose this motion.

Dated: June 24, 2016

Respectfully submitted,

SENNIGER POWERS LLP

By: /s/ Marc Vander Tuig

Marc W. Vander Tuig

Kyle G. Gottuso

100 North Broadway, 17th Floor

St. Louis, MO 63102

Phone: (314) 345-7000

Fax: (314) 345-7600

[mvandertuig@senniger.com](mailto:mvandertuig@senniger.com)

[kgottuso@senniger.com](mailto:kgottuso@senniger.com)

LEYDIG, VOIT & MAYER

John B. Conklin

Claudia W. Stangle

Two Prudential Plaza, Suite 4900

180 North Stetson

Chicago, IL 60601

Phone: 312-616-5600

[jconklin@leydig.com](mailto:jconklin@leydig.com)

[cstangle@leydig.com](mailto:cstangle@leydig.com)

*Attorneys for Defendant*

*Nidec Motor Corporation*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 24th day of June, 2016, the foregoing was filed via the Court's CM/ECF filing system, to be served electronically on all counsel of record in this matter.

/s/ Marc Vander Tuig